

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA

v.

ANGEL OCASIO

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Cause No. EP-11-CR-2728-KC

AFFIDAVIT OF WILLIAM S. WILTSE

Before me, the undersigned authority, personally appeared WILLIAM S. WILTSE, who, being by me duly sworn, deposed as follows:

“My name is WILLIAM S. WILTSE, I am over the age of 21 years, of sound mind, capable of making this affidavit, and have personal knowledge of the facts herein stated:

“1. I currently reside in Palm Beach County, Florida.

“2. I am a former police detective for the City of Salem, Oregon. I worked as a police officer in the State of Oregon for the past 18 years, during which time I conducted criminal investigations into the sexual abuse and exploitation of children.

“3. I am currently employed by TLO, LLC, as its Security Director over Law Enforcement Systems. I am neither an officer nor a director of TLO, LLC.

“4. TLO is a private company located in Boca Raton, Florida, that provides software and databases for the law enforcement community and other private investigators.

“5. TLO also manages the licensing for, and access to, the CPS, which is an application developed by TLO to allow law enforcement officers around the world to track the use and distribution of child pornography online.

“6. CPS is an advanced law enforcement method for identifying images of child pornography across this network, and tracking users who offer them for downloading on the network. The toolkit allows an investigator to search for such files in a given jurisdiction, and to mark such files to alert other investigators that a given computer is under investigation. This function allows enforcement officers to coordinate their efforts and prevents duplication of effort (where otherwise multiple investigators might pursue the same user).

“7. Because it is an advanced application for tracking online predators, information relating to the functions and uses of the CPS is guarded with the highest level of caution. Providing access to anyone outside of law enforcement would compromise both present and ongoing criminal investigations around the world.

“8. CPS is only made available to specifically trained law enforcement officers who have received intensive instruction in its uses. Those officers who receive the license are permitted to use CPS only in performance of their law enforcement work.

“9. CPS is a proprietary computer application protected under copyright law.

“10. Investigators do not receive the source code for CPS as part of their training, but only the application itself. One cannot access the source code simply by using the application.

“11. TLO vigorously protects the source code of CPS, as its value is largely derived from the fact that it is not widely accessible by the public. If CPS were to become widely available, its efficacy in tracking users of child pornography would be greatly diminished. For example, if users became aware of how CPS operates, they could more easily detect when they are being investigated, making it harder for law enforcement

officers to identify and track them.

I declare under criminal penalty of perjury that the foregoing is true and correct.

FURTHER SAYETH AFFIANT NOT.

DATED this 30th day of May, 2013.

William S. Wiltse
WILLIAM S. WILTSE

I, Lynn Dallmer, a Notary Public of the County and State aforesaid, hereby certify that William S. Wiltse personally known to me to be the affiant in the foregoing affidavit, personally appeared before me this day and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

Witness my hand and official seal this the 31 day of May, 2013.

Lynn Dallmer
Notary Public

My Commission expires:

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